

November 10, 2014

Terry Templeton, PG
Tennessee Department of Environment and Conservation
Memphis EFO
8383 Wolf Lake Blvd
Bartlett, TN 38133

RE:

MS4 Audit Response - Task Schedule

Lakeland, TN

A2H # 14219

Dear Mr. Templeton,

Please find attached the task schedule as discussed with you. This submittal is part of the City of Lakeland's compliance with the MS4 Audit.

If you have any questions or require additional information, please call at any time.

Sincerely,

A2H, INC.

David M. Smith, Ph.D., PE

Senior Civil Engineer - Manager

Required Actions

	Primary Implementor	October 2014	November 2014	December 2014	January 2015	February 2015	March 2015	April 2015 M	/lay 2015
1. Revised and update the SWMP as needed to address program changes and issues specifically related to Lakeland's MS4 program. Please refer to Section 4.1 of the MS4 permit for additional information.	Engineering								
2. Develop and implement educational and/or outreach programs which specifically focus on pollutants of concern from "hot spots." Please refer to Section 4.2.1 of the permit for additional information.	Planning/ Engineering								
3. Modify and update the PIE to include educational campaigns targeted to the general public and professional chemical applicators on the proper storage, use, and disposal of pesticides and herbicides, and fertilizer use. Please refer to Section 4.2.1.d of the MS4 permit for additional information.	Engineering								
4. Modify and enhance the ERP to address all of the requirements listed in the permit, and be more comprehensive in scope. Please refer to Sections 4.2.3 and 4.5 of the MS4 permit for additional information.	Engineering								
5. Revise the ERP to address all types of illicit discharges, and modify the ERP to more clearly reference the connection between the ordinances and the ERP. Please refer to Sections 4.2.3 and 4.5 of the MS4 permit for additional information.	Engineering								
6. Develop guidelines and procedures to make available to all appropriate municipal staff who would respond to a hazardous waste or material spill. Please refer to Section 4.2.3 for additional information.	Engineering								
7. Add training specifically addressing the hazards associated with illegal discharges and improper disposal of waste to the annual training agenda or to some other municipal staff training session. Please refer to Section 4.2.3 of the MS4 permit for additional information.	Engineering	Development of the	e training						
Modify the SWMP as needed to provide staff with written procedures that address:	Engineering								
a. All requirements of the current Construction General Permit concerning special conditions for impaired and exceptional waters;									
b. Procedures for site plan review which incorporate consideration of potential water quality impacts;c. Procedures addressing evaluation of submitted plans' completeness and overall BMP effectiveness, as well as for all other aspects of the City's construction stormwater program.									
9. All plan reviewers must receive a certificate of completion from the Level II design Principles for Erosion Prevention and Sediment Control for Construction Sites course. Please refer to Section 4.2.4 of the MS4 permit for additional information.	Engineering								
10. Modify the ordinances appropriately to address this program element (MCM) requirement by the deadline indicated in the permit. Please refer to Section 4.2.5 of the MS4 permit for more information.	Planning/ Engineering								
11. Modify the ERP to include project review, approval, and enforcement procedures as related to this Minimum Control Measure.	Engineering								
12. Train municipal staff on the reduction of pollutants in stormwater runoff on a regular basis and document the training. Please refer to Section 4.2.6 of the MS4 permit for additional information.	Engineering								
13. Revise the ERP to address all illicit discharges, not just illicit discharge related to construction activities. Please refer to Section 4.5 of the MS4 permit for additional information.	Engineering								
14. Develop a formalized plan for tracking chronic violators to reduce the rate of noncompliance recidivism from chronic violators. Please refer to Section 4.5.4 of the MS4 permit for additional information.	GIS								
15. Present each annual report at a public hearing for suggestions and comments prior to submitting the report to the Division by September 30 th of each year. The public hearings should be properly advertised and documented.	Engineering								
16. Please provide a written response to the Division by April 25, 3014, that discusses how the requirements that have been noted will be addressed and your proposed timeline for those items to be addressed. Also include information about the division's recommended actions and how those which will be implemented will be accomplished.									

Recommended Actions

Recommended Actions	Primary Implementor	October 2014	November 2014	December 2014	January 2015	February 2015	March 2015	April 2015	May 2015
Track additional key information, including but not limited to, the date activities occur and the number of participants in attendance or materials distributed. Additional information regarding expected water quality improvements should also be recorded.	Engineering/ Neighborhood Services								
2. Conduct an appropriate activity to evaluate the effectiveness of the PIE, and based on the results of the activity, modify the PIE as necessary.	Planning/ Neighborhood Services								
3. Keep hard copies of the newspaper articles and printouts from media sources on file for documentation, and utilize an effective tracking system to manage public involvement and participation activities.	Neighborhood Services								
4. Modify the web page so that the contact information for the appropriate stormwater staff is more prominently displayed on the stormwater web page.	Website Maintenance								
5. Continue these activities, but also look for additional activities by which citizens, HOAs, scouts, or other groups can provide assistance to Lakeland to continue improving stormwater quality. Utilize a more detailed tracking system for documenting key information pertaining to each event and to document related or expected water quality improvements.	Engineering/ Neighborhood Services								
6. Link enforcement information to the GIS to use as a possible method of tracking enforcement actions taken and documenting results.	GIS/ Inspection/ Engineering								
7. Implement additional measures that will allow the public to directly report illicit discharges, such as adding a stormwater hotline or enhancing the City's website to allow citizens an additional mechanism for reporting stormwater issues to City staff.	Website Maintenance								
8. Develop a more detailed tracking system for documenting key information pertaining to each violation and to allow for easier summarization of activities by location, time period, etc.	GIS/ Inspection/ Engineering								
9. Utilize all available enforcement measures to address sediment-laden stormwater contamination within Lakeland's jurisdiction. Modify the ERP to include enforcement steps involving construction activity that will be available to the City's stormwater staff. Track information such as construction plans review and enforcement action utilized by the City in an electronic tracking system or database.	Planning/ Inspection/ Engineering								
10. Incorporate the new Land Development Regulations by reference into the SWMP.	Planning/ Engineering								
11. Lakeland's stormwater staff should continue to increase their knowledge about the CGP and the Tennessee Erosion and Sediment Control Handbook, and be aware of any updates in both documents. They should expand their knowledge of the construction program by attending appropriate training, webinars and conferences, if possible.	Engineering								
12. Implement a tracking system in advance of the ordinance changes so that the tracking system can be utilized immediately.	GIS/ Inspection/ Engineering								
13. Review the Manual to ensure that the Manual provides information regarding stormwater Best Management Practices (BMPs) and/or spill control procedures.	Engineering								
14. Modify the SWMP to include the procedures regarding the collection and disposal of waste.	Engineering								
15. Modify the SWMP to include procedures on ways to ensure that new flood management projects assess the impacts on water quality. If possible, examine existing projects for incorporating additional water quality protection devices or practices.	Engineering								
16. Utilize all available enforcement measures to address sediment-laden stormwater contamination within the jurisdiction.	Inspection/ Engineering								
17. Utilize a more detailed tracking system for documenting key information pertaining to each violation and to allow for easier summarization of enforcement activities by location, time period, etc.	GIS/ Inspection/ Engineering								
18. Expand Lakeland's field screening program to include all types of stowmwater outfalls into water of the state in order to comprehensively identify potential sources of illicit discharge.	Inspection/ Engineering								